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June 12, 2019

VIA ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

Defendant Keith Raniere submits this brief letter with a proposed instruction to read to the jury following the testimony yesterday regarding the CDF Irrevocable Trust:

Please be advised that there is nothing improper about one party paying for the legal representation of another party. The Government and the Court were each advised at an early stage of the proceedings of this financial arrangement. Therefore, it is important that you keep in mind that there is nothing about this financial arrangement that is improper and it is not being offered for that reason. Rather, you may, if you see fit, consider this financial arrangement as part of the Government's evidence that an enterprise existed. That is an issue solely for you to consider. But I am admitting information of this financial arrangement for that purpose and no other.

Thank you for your consideration.

Respectfully submitted,

/s/  
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Marc A. Agnifilo, Esq., *Of Counsel*  
Teny R. Geragos, Esq.

cc: Counsel for the government (via ECF)